

JOHN R. BAILEY
Nevada Bar No. 0137
DENNIS L. KENNEDY
Nevada Bar No. 1462
JOSHUA P. GILMORE
Nevada Bar No. 11576
PAUL C. WILLIAMS
Nevada Bar No. 12524
STEPHANIE J. GLANTZ
Nevada Bar No. 14878
BAILEY ♦ KENNEDY
8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148-1302
Telephone: 702.562.8820
Facsimile: 702.562.8821
JBailey@BaileyKennedy.com
DKennedy@BaileyKennedy.com
JGilmore@BaileyKennedy.com
PWilliams@BaileyKennedy.com
SGlantz@BaileyKennedy.com

*Attorneys for Plaintiff/Counterdefendants
TPOV Enterprises, LLC, TPOV Enterprises 16, LLC,
and Rowen Seibel*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TPOV ENTERPRISES 16, LLC, a Delaware
limited liability company,

Plaintiff,

vs.

PARIS LAS VEGAS OPERATING COMPANY,
LLC, a Nevada limited liability company,

Defendant.

PARIS LAS VEGAS OPERATING COMPANY,
LLC, a Nevada limited liability company,

Counterclaimant,

vs.

TPOV ENTERPRISES, LLC, a Delaware limited
liability company, TPOV ENTERPRISES 16,
LLC, a Delaware limited liability company,
ROWEN SEIBEL, an individual,

Counterdefendants.

Case No. 2:17-cv-00346-JCM-VCF

**STIPULATION AND ORDER
EXTENDING DEADLINE FOR OBJECTION
TO REPORT AND RECOMMENDATION
AND ORDER [ECF No. 194]**

(FIRST REQUEST)

Pursuant to LR IA 6-1, Plaintiff/Counterdefendant TPOV Enterprises 16, LLC (“TPOV 16”); Counterdefendant TPOV Enterprises, LLC (“TPOV”); Counterdefendant Rowen Seibel (“Seibel”); and Defendant/Counterclaimant Paris Las Vegas Operating Company, LLC (“Paris”) (collectively, the “Parties”) stipulate and agree as follows:

1. On October 15, 2019, Paris filed a Motion for Terminating Sanctions, seeking case-terminating sanctions against TPOV 16, TPOV, and Seibel. (ECF Nos. 152 and 153.)

2. On February 19, 2020, United States Magistrate Judge Cam Ferenbach entered a Report and Recommendation and Order (the “Report and Recommendation”). (ECF No. 194.)

3. In the Report and Recommendation, the Magistrate Judge recommended that Paris’ Motion for Terminating Sanctions be granted, in part; specifically, recommending that the Answer filed by TPOV 16, TPOV, and Seibel (ECF No. 40) be stricken as to TPOV only (i.e., not as to TPOV 16 and Seibel). (ECF No. 194, at 13:5-8.)

4. On March 2, 2020, TPOV 16, TPOV, and Seibel filed a motion seeking to replace their counsel with the law firm of Bailey❖Kennedy. (ECF No. 195.) That afternoon, the Court granted TPOV 16, TPOV, and Seibel’s application for Bailey❖Kennedy to substitute in as their counsel. (ECF No. 196.)

5. Currently, the deadline to file an objection to the Report and Recommendation is tomorrow, March 4, 2020. *See* LR IB 3-2(a).

6. The deadline to file an objection to the Report and Recommendation shall be extended by seven (7) days to March 11, 2020.

7. Good cause exists to extend the deadline to file an objection to the Report and Recommendation to March 11, 2020. Recently engaged counsel for TPOV 16, TPOV, and Seibel needs sufficient time to acclimate themselves with the matter (including the issues related to the Motion for Terminating Sanctions) in order to submit an objection to the Report and Recommendations, which, from their perspective, is particularly true given that the Magistrate Judge’s recommended sanction is a case-terminating sanction as to TPOV.

8. This is the first request to extend time, is made in good faith, and will not impact any other deadlines.

Dated this 3rd day of March, 2020.

BAILEY ♦ KENNEDY

By: /s/ Paul C. Williams

JOHN R. BAILEY

DENNIS L. KENNEDY

JOSHUA P. GILMORE

PAUL C. WILLIAMS

STEPHANIE J. GLANTZ

*Attorneys for Plaintiff/Counterdefendants
TPOV Enterprises, LLC, TPOV Enterprises
16, LLC, and Rowen Seibel*

Dated this 3rd day of March, 2020.

PISANELLI BICE PLLC

By: /s/ M. Magali Mercera

JAMES J. PISANELLI

DEBRA L. SPINELLI

M. MAGALI MERCERA

BRITTNIE T. WATKINS

400 South 7th Street, Suite 300

Las Vegas, Nevada 89101

JJP@pisanellibice.com

DLK@pisanellibice.com

MMM@pisanellibice.com

BTW@pisanellibice.com

*Attorneys for Defendant/Counterclaimant
Paris Las Vegas Operating Company, LLC*

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: March 4, 2020

Respectfully submitted by:

BAILEY ♦ KENNEDY

By: /s/ Paul C. Williams

JOHN R. BAILEY

DENNIS L. KENNEDY

JOSHUA P. GILMORE

PAUL C. WILLIAMS

STEPHANIE J. GLANTZ

*Attorneys for Plaintiff/Counterdefendants
TPOV Enterprises, LLC, TPOV Enterprises 16, LLC,
and Rowen Seibel*